

Chang, Lisa

From: Chang, Lisa
Sent: Wednesday, August 28, 2013 3:58 PM
To: 'Tiffany Waters'
Subject: "Paperwork Reduction Act"/Information collection rule requirements

Hi Tiffany,

I'm pasting below the standard "term and condition" (T&C) language from other awards we have made to other grantees regarding the "Information Collection Rule" (ICR) requirements that I mentioned by phone. For some inexplicable reason, this was not included as a T&C in the NWIFC LO award. I will try to find out why this occurred. I believe this requirement does apply to the work Swinomish is doing. I will try to put together the paper trail of why this is (i.e., where it is specifically stated in our award or related documents that this requirement applies to subawardees) – I was trying to find that after we talked, and haven't put my finger on it yet, so am just sending this part to you now while I keep looking.

My apologies again for having missed the boat on this...I'll do what I can to find out the full scope of our options with the aim of minimizing hardship on the subawardee and supporting the best and most defensible outcomes from their important work.

4. Information Collection Requirements

EPA and the recipient agree to comply with the requirements of the Paperwork Reduction Act in completing the project. Because the scope of work includes a survey, a questionnaire or similar information-gathering activity, the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 *et seq.*), requires EPA to obtain Office of Management and Budget (OMB) clearance prior to the recipient's collection of information by means of identical questions posed to 10 or more persons. The recipient will provide to the EPA Project Officer the following information: (1) description of the information to be collected; (2) explanation of the need for the information; and (3) to whom the survey is being directed.